

**DECLARATION**

I Simon J. Rosen, Esq., hereby Declare under penalty of perjury that the following is true and correct, to the best of my knowledge information and belief:

1. I am counsel of record for defendants in this case.
2. The motion for reconsideration is being filed today because this Court's 10/22/20 and 10/29/20 Orders require me to turnover al remaining documents to plaintiff, and further, to certify that all documents in defendants' possession have been turned over.
3. Defendant Feldman Sr. has informed me that an additional Twenty (20) hours are required to turnover all remaining documents in defendants' possession.
4. Declarant is unable to certify that all records have been produced and that there are no more records in defendants' possession if defendants acknowledged that there may be more records out there.
5. Declarant seeks one additional business day.
6. It is Declarant's understanding that defendants have expended many, many hours searching for remaining documents; also, in some circumstances once documents are located they need to be properly formatted, scanned, copied, and then transmitted to defense counsel; and then defense counsel need to review the documents, and in some situations, in turn properly format, scan, copy and then transmit same to plaintiff's counsel-a time consuming process; accordingly defendants require one more day, thereby enabling full compliance by defendants and by Declarant to certify same.

7. Granting reconsideration shall not cause undue prejudice to plaintiff.

AND SO I DECLARE AS OF THIS DATE.

Dated: October 30, 2020 /Simon J. Rosen, Esq./

**EXHIBIT “A”**